

COLORADO DEPARTMENT OF PUBLIC HEALTH AND ENVIRONMENT
AIR POLLUTION CONTROL DIVISION
OPERATING PERMIT MODIFICATION SUMMARY

PERMIT NUMBER: 95OPBA029

AIRS ID #: 0090001

DATE: November 18, 2014

APPLICANT: Colorado Interstate Gas Company, LLC - Flank Compressor Station

REVIEW ENGINEER: Jacqueline Joyce

SOURCE DESCRIPTION

Colorado Interstate Gas Company, LLC (CIG) has applied for a modification to their Operating Permit issued for the Flank Compressor Station located at Section 5, T34S, R42W, approximately 16 miles south on Stonington, in Baca County. This facility is designed to compress and condition natural gas before it is delivered to sales pipelines and is classified under SIC 4922. This facility is located in an area designated as attainment for all criteria pollutants. This source is not classified as a major stationary source with respect to Prevention of Significant Deterioration (PSD) requirements. Oklahoma and Kansas are within 50 miles of this facility and are affected states. There is no Federal Class I designated areas within 100 km of this facility. This source is not subject to the Accidental Release provisions of section 112(r) of the Federal Clean Air Act. In addition, three engines and one glycol dehydrator are subject to the Compliance Assurance Monitoring (CAM) requirements in 40 CFR Part 64.

REQUESTED MODIFICATIONS

The current Title V permit (issued January 1, 2013) includes the requirements in 40 CFR Part 63 Subparts ZZZZ (National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines) and DDDDD (National Emissions Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters) that applied to the engines, boilers and process heaters at the facility at that time. Since the Title V permit has been issued, EPA promulgated revisions to 40 CFR Part 63 Subparts ZZZZ and DDDDD that affect the engines, boilers and process heaters at this facility. CIG has requested that the permit be revised to include the revisions to 40 CFR Part 63 Subparts ZZZZ and DDDDD that apply to the engines, boilers and process heaters at this facility. Since the engines at this facility are now subject to work practice standards in lieu of emission limitations and the boilers and process heaters are subject less frequent tune-ups, this modification must be processed as a significant modification (requires 30-day public comment and 45-day EPA review). An application to modify the permit to update the requirements in 40 CFR Part 63 Subparts ZZZZ and DDDDD was submitted on August 22, 2014.

In addition to the modification discussed above, CIG submitted an application on November 10, 2014 to update the baseline pressure differentials for engines E002 through E004. The baseline pressure differential is a CAM indicator for these engines. The Title V permit requires that CIG submit an application to update the pressure differential for these engines after a performance test is conducted following the replacement of the catalyst. Such a modification is to be processed as a minor modification and this modification is being processed in conjunction with the significant modification discussed above. The November 10, 2014 modification application also requests that the insignificant activity list in Appendix A but updated to include three (3) new produced water tanks. There is no requirement to update the insignificant activity list, thus this change would be considered administrative in nature and can be processed as a minor modification.

CHANGE IN EMISSIONS DUE TO MODIFICATION

There is no change in the actual and/or permitted emission limitations associated with this modification.

MODIFIED EMISSION SOURCES

The following discussion identifies the significant changes that were made with this modification. Other minor language changes were made to other permit conditions and are addressed in Appendix F of the permit.

Alternative Operating Scenario (Section I.2) and Portable Monitoring (Section II.7) – The language in these conditions were updated to the latest versions. The primary changes to the language in these conditions were to update the web site address.

Engines and Emergency Generator (Sections II.1, 2, 3 and 10) – Updated Conditions 1.6, 2.10, 3.6 and 10 to include the latest revisions to 40 CFR Part 63 Subpart ZZZZ that apply to these engines.

Boilers and Process Heaters (Section II.9) – Revised the language in Condition 9.4 to reflect the latest revisions to 40 CFR Part 63 Subpart DDDDD.

Baseline Pressure Differential for CAM Indicator (Section II.8 and Appendix G) – The baseline pressure differentials in Condition 8.1.1.1.a and Appendix G (table) were revised

Insignificant Activity List (Appendix A) - Added three new produced water tanks to the insignificant activity list. In addition, the notes in the table for the storage tanks were renumbered and/or rearranged, additional notes were added and the insignificant activity category for the crude oil tanks was revised (the specific insignificant activity category for crude oil tanks in Reg 3 was removed).